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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO

ALEXANDRA ROGERS, an individual,

Plaintiff,

vs.

ESHARES INC. d/b/a CARTA, INC., a Delaware
corporation, JEFF PERRY, an individual, and
HENRY WARD, an individual

Defendants.

Civil Action No.:

COMPLAINT

CGC-23-608206

1. SEXUAL HARASSMENT IN VIOLATION OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT (GOV. CODE § 12940 *et seq.*)
2. AIDING AND ABETTING SEXUAL HARASSMENT IN VIOLATION OF THE CALIFORNIA FAIR HOUSING AND EMPLOYMENT ACT (GOV. CODE § 12940 *et seq.*)
3. RETALIATION IN VIOLATION OF THE CALIFORNIA FAIR HOUSING AND EMPLOYMENT ACT (GOV. CODE § 12940 *et seq.*)

JURY TRIAL DEMANDED

1 Plaintiff ALEXANDRA ROGERS complains and alleges as follows:

2 **INTRODUCTION**

3 1. From the time she began her employment in March 2021, Plaintiff Alexandra Rogers
4 (“Plaintiff” or “Ms. Rogers”) was an exemplary employee for Defendant eShares Inc. d/b/a Carta, Inc.
5 (“Entity Defendant,” “Carta” or “the Company”). Throughout her tenure with the Company, Ms. Rogers
6 received consistent positive feedback regarding her job performance and was eventually promoted in
7 recognition of her stellar track record. Unfortunately, the Company, as well as Mr. Jeff Perry and Mr.
8 Henry Ward (collectively the “Individual Defendants”; together with Entity Defendant the
9 “Defendants”) engaged in a sustained pattern of sexual harassment and retaliation that culminated in the
10 termination of Ms. Rogers’ employment on July 20, 2023.

11 2. On June 7, 2022, Mr. Perry inappropriately groped Ms. Rogers while attending a work
12 outing at a happy hour prior to a baseball game. While Ms. Rogers was waiting in line for the bathroom,
13 Mr. Perry walked by her, slapped the top of her thigh, and grasped it in his hand. Although Ms. Rogers
14 immediately reacted to Mr. Perry and expressed her discomfort at his inappropriate advances, Mr. Perry
15 simply laughed it off and walked away. Rather than support Ms. Rogers, Company employees such as
16 Alicia Hotson instead shifted blame to Ms. Rogers for “having her leg out”, as if her exposed leg was
17 an invitation for sexual harassment. Then, on August 31, 2022, Mr. Perry, now Ms. Rogers’ immediate
18 supervisor, again groped her, this time at a Company sales dinner. During the dinner, Mr. Perry reached
19 under the table and placed his hand on Ms. Rogers’ leg on two separate occasions.

20 3. After conducting a cursory investigation, in which Carta repeatedly shifted blame to Ms.
21 Rogers for Mr. Perry’s sexual advances, the Company took no disciplinary action against Mr. Perry.
22 Instead, Carta and its management waged a retaliatory campaign against Ms. Rogers. At every
23 opportunity, Mr. Ward, the Company’s CEO, singled out and demeaned Ms. Rogers in front of her
24 colleagues. As a result, it became increasingly clear to Ms. Rogers that the Company was not taking her
25 allegations of sexual misconduct against Mr. Perry seriously.

26 4. On June 1, 2023, Ms. Rogers, through counsel, sent a letter to Carta’s HR department
27 documenting in detail Mr. Perry’s sexually inappropriate behavior with Ms. Rogers and Defendants’
28 subsequent illegal behavior. Unsurprisingly, the Company responded by deflecting blame and

1 insinuating that Ms. Rogers fabricated her claims against the Company to escape unfavorable
2 performance reviews. Finally, on July 20, 2023, the Company terminated Ms. Rogers under the pretext
3 of a reduction in force.

4 5. Sadly, Defendants' behavior is consistent with the Company's long and sordid history of
5 abuse, harassment, and retaliation against its female employees, including numerous lawsuits, countless
6 complaints from female employees about Carta's toxic workplace culture, and the departure of CTO
7 Jerry Talton after sexually harassing at least nine female employees. Ms. Rogers now brings this suit
8 alleging violations of the California Fair Housing and Employment Act ("FEHA") against Defendants
9 to recover compensatory and punitive damages so that Carta may finally take steps to safeguard its
10 female employees from the predatory advances of upper management.

11 **JURISDICTION AND VENUE**

12 6. Plaintiff is informed and believes, and thereon alleges that Entity Defendant was, at all
13 relevant times, a Delaware corporation operating within the state of California and thus subject to the
14 jurisdiction of California courts by reason of "minimum contacts"; transacted and conducted business
15 in the state of California; and is thus subject to the jurisdiction of all laws, regulations, and court
16 decisions rendered by the state of California.

17 7. Jurisdiction is conferred on this Court as to all causes of action because they arise under
18 state statutory or common law. Jurisdiction is proper in this Court because alleged damages exceed
19 \$25,000.00, exclusive of costs and attorneys' fees.

20 8. Venue is proper in this Court under Code of Civil Procedure Section 395.5 because Entity
21 Defendant's principal place of business is in San Francisco County and the events giving rise to the
22 claims herein occurred in that county.

23 **PARTIES**

24 9. Plaintiff Alexandra Rogers is an individual residing in San Francisco, California.

25 10. Entity Defendant is a Delaware corporation existing under the laws of the state of
26 California and operating in the state of California and within this County.

27 11. At all relevant times, Defendant Mr. Jeff Perry has been employed by and an agent of
28 Entity Defendant. Upon information and belief, Mr. Perry is a resident of the State of California.

12. At all relevant times, Defendant Mr. Henry Ward has been employed by, and an agent of, Entity Defendant in the position of Chief Executive Officer (“CEO”). Upon information and belief, Mr. Ward is a resident of the State of California.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

13. On or about July 19, 2023, Plaintiff filed a timely complaint of discrimination against Carta with the California Department of Fair Employment and Housing (“DFEH”). On August 1, 2023, Plaintiff amended her complaint to include her termination.

14. On or about July 19, 2023, the DFEH issued Plaintiff a Notice of Right to Sue in connection with these charges. Copies of Plaintiff’s DFEH complaints and Notice of Right to Sue are attached to this Complaint as “Exhibit A,” and are incorporated by reference herein.

15. On August 2, 2023, Plaintiff served true and correct copies of the DFEH complaint and Right to Sue Notice on Defendant pursuant to Gov. Code § 12962.3.

16. Plaintiff has exhausted the administrative remedies available to her, and any and all other prerequisites to filing of this suit have been met.

STATEMENT OF FACTS

I. There is a Culture of Misogyny and Sexual Harassment Entrenched at Carta

17. The information set forth in this section is alleged upon information and belief and based on reports from reputable news agencies and recently filed lawsuits against Carta:

18. Carta has a well-documented and notorious reputation for misogyny and tolerance of sexual harassment. Any who dare speak up and complain about unfair treatment are ignored and/or retaliated against.

19. In 2020, the Company’s former VP of marketing, Emily Kramer, sued Carta for gender discrimination, retaliation, wrongful termination, and violating the California Equal Pay Act. Kramer, the only female executive at the time of her employment with the Company, discovered she was being paid \$50,000 less relative to her male counterparts and that her initial equity grant was one-third the number of shares offered to male employees in comparable positions. Two men who joined the Company at roughly the same time as Ms. Kramer with fewer years of relevant work experience were promoted, while Ms. Kramer’s requests for promotion were continuously ignored. After Ms. Kramer

1 spoke out about the Company's sexist culture in an attempt to remedy it, she was retaliated against. For
2 instance, she stopped being included in meetings that she should have been included in. The CEO,
3 Henry Ward, not only ignored the sexism that Ms. Kramer faced, but participated in it. For example,
4 Mr. Ward commented that Ms. Kramer received "passes because she is a woman."

5 20. A female former product manager reported that in 2017, while staying in a corporate
6 apartment, she woke up to discover a male senior co-worker naked in front of her. The Company
7 grossly mishandled this incident and excused it as sleepwalking.

8 21. That same year, an internal group of employees tasked with discussing women's issues
9 proposed that Carta create a way for women to anonymously report harassment or discrimination
10 without fear of retaliation. Mr. Ward refused and the next day, one of the women who spoke up in the
11 meeting with Mr. Ward was terminated.

12 22. The former head of liquidity solutions, a woman, reported to the *New York Times* that
13 she was treated like "a prop" at investor meetings and discouraged from speaking. After she raised
14 concerns to Carta's legal team about potentially deceptive information provided to the investors from
15 executives, she was told that she had performance issues with no specifics and offered a lesser
16 compensation plan.

17 23. Additionally, several women filed complaints with HR against Carta's Chief Delivery
18 Officer, David Kim. One of Ms. Rogers' colleagues stated to her "I know many women have filed HR
19 complaints against DK [David Kim]. I'm surprised he still has a job." The Company is aware of
20 these accusations, given that an HR employee asked a female employee at Carta if "she knew of any
21 women who have been treated incorrectly by DK [David Kim]."

22 24. In December 2022, CTO Jerry Talton departed from Carta after making sexually
23 explicit, offensive, discriminatory, and harassing advances to at least nine female employees. Despite
24 promises to change the Company culture, it is apparent that Mr. Ward and Carta have taken no steps to
25 address and remedy sexual harassment at the Company.

26 25. It is no wonder that, against this backdrop of gender discrimination, sexual harassment,
27 and retaliation, Ms. Rogers' harasser felt emboldened to mistreat her with impunity. Finding a solution
28 to the Company's widespread culture of sexual harassment and gender discrimination is simply not a

1 priority for Mr. Ward or the Company.

2 **II. Ms. Rogers is Hired by Carta and Sexually Harassed by Mr. Perry**

3 26. Plaintiff has been an employee of the Company since March 8, 2021. She began working
4 for the Company as an Account Executive, Investor Services, and was promoted to her current role of
5 Manager, Sales IS-MM in August of 2022.

6 27. On June 7, 2022, while attending a work outing at a happy hour prior to a baseball game,
7 Jeff Perry, CRO, inappropriately groped Ms. Rogers. While Ms. Rogers was waiting in line for the
8 bathroom, Mr. Perry walked by her and slapped the top of her thigh, and then proceeded to grab it. Ms.
9 Rogers instantly reacted to Mr. Perry's inappropriate conduct and instinctually got angry at him for
10 inappropriately touching her without her permission. Rather than apologizing or addressing this
11 behavior, Mr. Perry proceeded to laugh it off and walk away.

12 28. The next day, on June 8, 2022, a former manager at the Company, messaged Ms. Rogers
13 stating that the photo Mr. Perry took of her was amusing. Ms. Rogers was shocked at this statement
14 given she had no idea Mr. Perry took a photo of her, let alone that Mr. Perry proceeded to inappropriately
15 circulate this photo with her colleagues.

16 29. On August 31, 2022, Ms. Rogers attended a sales dinner with her colleagues, including
17 Mr. Perry. At this time, Mr. Perry was Ms. Rogers' immediate supervisor given her promotion to
18 Manager, Sales in August 2022. All the individuals directly surrounding Ms. Rogers at the dinner were
19 men. During the dinner, Mr. Perry reached under the table and placed his hand on Ms. Rogers' leg on
20 two separate instances. Mr. Perry was also so brazen as to stroke Ms. Rogers' arm above the table. There
21 is no mistaking Mr. Perry's inappropriate and harassing conduct. Ms. Rogers immediately became
22 uncomfortable and intimidated, as not only was she surrounded by majority men while inappropriately
23 groped by the Company's CRO, but Mr. Perry was now her immediate supervisor directly responsible
24 for her recent promotion.

25 **III. Ms. Rogers Reports the Harassment & is Retaliated Against**

26 30. Given the drastic power imbalance and authority Mr. Perry held over Ms. Rogers as her
27 direct supervisor, she did not feel comfortable reporting these incidents to the Company until June 1,
28 2023, for fear of retaliation. However, Ms. Rogers eventually had no choice but to document the

deplorable behavior of the CRO because the incidents were negatively impacting her working conditions.

31. Ms. Rogers reported her concerns with the hope that the Company would thoughtfully and thoroughly investigate her claims – she did not expect to be victim-blamed and retaliated against, as is the case here, further exacerbating the distress and anxiety she experiences at work daily having to report to her harasser.

32. Just 10 days following her complaint to Niesha Sweet in the Company’s Human Resources Department, Carta’s CEO, Henry Ward, began treating Ms. Rogers in an aggressive and demeaning manner during several meetings.

33. During the first meeting, Mr. Ward interrogated Ms. Rogers and spoke to her in an aggressive and inappropriate manner. Later that same day, Mr. Ward continued his retaliation by again questioning Ms. Rogers in an aggressive manner, becoming irate with her, and demeaning her by singling her out in front of her colleagues. Mr. Ward’s behavior was so inappropriate that Ms. Rogers’ colleagues who witnessed the encounters reached out to her to comfort her and express disgust with Mr. Ward’s behavior. The Company’s retaliatory conduct has become so prevalent that her manager, Ms. Rachel Mayes, advised Ms. Rogers to stop speaking entirely during a presentation on June 30, 2023.

34. Another of Ms. Rogers’ colleagues, a woman, complained to Ms. Rogers about Mr. Ward’s conduct and expressed that she felt Mr. Ward treated women lesser than their male counterparts in the workplace. That same coworker also indicated that she was looking into instances of harassment because she thought the CEO’s behavior could constitute workplace harassment.

35. Furthermore, Ms. Mayes recently informed Ms. Rogers that Mr. Ward “doesn’t like women with strong personalities” and that he and Mr. Perry had commented that Ms. Rogers has an “attitude.” Ms. Rogers’ manager advised her to apologize to him during a team dinner in order to placate him, but also encouraged her to reach out to HR to report her concerns with how Mr. Ward treats women.

IV. The Company Failed to Rectify the Sexual Harassment

36. The Company’s “investigation” into this matter does little to inspire hope that the unlawful and harassing conduct will be addressed and rectified.

37. In fact, during the call, the Company proceeded to victim-blame Ms. Rogers by

questioning why she's reporting now, why she chose a seat next to Mr. Perry during the August 2022 dinner, and whether Ms. Rogers "adequately declined" the June 2022 groping from Mr. Perry. However, as explained by Ms. Rogers, she was the last person to arrive at the table and took the only remaining seat to Mr. Perry. Regardless, the fact that Ms. Rogers sat next to Mr. Perry was not an open invitation for his sexual advances.

38. After Ms. Rogers filed the complaint, she did not hear from HR until June 21, 20 days after speaking with them, despite the fact that Ms. Sweet assured her that she would hear from the Company's legal team promptly. No one from HR ever attempted to check in on Ms. Rogers' well-being despite promising that they would follow up and keep her informed. Ms. Rogers was not assigned to a different supervisor nor did the Company make any attempt to accommodate her in the period after she filed the complaint, for instance by allowing her to work remotely.

39. On June 1 2023, Ms. Rogers, through counsel, sent a letter to Carta's HR department documenting in detail Mr. Perry's sexually inappropriate behavior with Ms. Rogers and Defendants' subsequent illegal behavior. Unsurprisingly, the Company responded by deflecting blame and insinuating that Ms. Rogers fabricated her claims against the Company to escape unfavorable performance reviews. On July 7, Ms. Mayes pressured Ms. Rogers to return to her prior role as a sales representative, effectively a demotion, because Mr. Ward believed she had "an attitude." Ms. Rogers declined the request, telling Ms. Mayes that she was not interested in a demotion.

40. Finally, on July 20, 2023, the Company terminated Ms. Rogers under the pretext of a reduction in force. Notably, but unsurprisingly, Carta largely targeted women for demotion or termination. In fact, Ms. Rogers was the only manager that the Company terminated. Rachel Mayes, Ms. Rogers' previous director, was demoted to the position previously occupied by Ms. Rogers and replaced with a male employee, Jason Jenks.

FIRST CAUSE OF ACTION
Sexual Harassment in Violation of the California Fair Housing and Employment Act
Gov. Code § 12940 *et seq.*
(Against Entity Defendant and Individual Defendant Mr. Perry)

41. Plaintiff re-alleges and incorporates by reference all previous paragraphs as if fully set forth herein.

42. Cal. Gov. Code § 12940(j) provides in pertinent part it is an unlawful employment practice for an employer to harass an employee on the basis of sex and/or gender. This section further provides that “loss of tangible job benefits shall not be necessary in order to establish harassment.”

43. Cal. Gov. Code § 12940(j) further provides that, “An employee of an entity subject to [FEHA] is personally liable for any [sexual harassment] that is perpetrated by the employee.”

44. California courts have held “to state a cause of action on this theory [quid pro quo sexual harassment], it is sufficient to allege that a term of employment was expressly or impliedly conditioned upon acceptance of a supervisor’s unwelcome sexual advances.” *Mogilefsky v. Superior Court* (1993) 20 Cal.App.4th 1490, 1414.

45. Additionally, sexual harassment of this form establishes both personal liability as to the alleged harasser and strict liability as to the employer for the harasser’s actions, provided that the harasser is a supervisor under the FEHA.

46. To establish a prima facie case for quid pro quo sexual harassment, a plaintiff must establish (1) the harasser made unwanted sexual advances to the plaintiff or engaged in other unwanted verbal or physical conduct of a sexual nature; (2) the terms of employment, job benefits, or favorable working conditions were made contingent, by words or conduct, on the plaintiff’s acceptance of the alleged harasser’s sexual advances or conduct; (3) that at the time of the alleged sexual harasser’s conduct, he was a supervisor or agent of the company; (4) plaintiff was harmed; and (5) the alleged harasser’s conduct was a substantial factor in causing plaintiff’s harm. *Id.*

47. Mr. Perry unlawfully groped and touched Ms. Rogers’ thigh on numerous occasions without her permission and in a sexual manner, including on June 7, 2022, and August 31, 2022.

48. Immediately following the first incident of harassment, Ms. Rogers was promoted, with Mr. Perry becoming her immediate supervisor. Less than one month later Mr. Perry again groped Ms. Rogers. As a result, Ms. Rogers reasonably believed that her employment was impliedly conditioned on acceptance of Mr. Perry’s sexual advances. After reporting these incidents of harassment, Ms. Rogers faced hostility from the Company’s management and was ultimately terminated on July 20, 2023.

49. When Mr. Perry groped Ms. Rogers on August 31, 2022, he was aware that she had recently accepted a promotion and that he would be her direct supervisor beginning the very next day,

September 1, 2022.

50. On June 1, 2023, Ms. Rogers reported Mr. Perry's sexual harassment to the Company. However, rather than conduct a thorough investigation, the Company responded by attempting to shift blame to Ms. Rogers and create a hostile and toxic work environment.

51. Ms. Rogers was harmed in that she became uncomfortable and distressed at work, she experienced retaliation for her complaints, further exacerbating her emotional distress, and her professional reputation was harmed. Additionally, Ms. Rogers was ultimately terminated for refusing to acquiesce to the Company's toxic workplace culture, resulting in lost income.

52. Mr. Perry's sexual harassment and the Company's response was a substantial factor in causing this harm.

53. As a direct, foreseeable, and proximate result of Defendants' actions, Plaintiff has suffered and continues to suffer harm in an amount according to proof. Additionally, Defendants acted with malice and/or oppression by retaliating against Ms. Rogers and terminating her employment when she had the courage to report Mr. Perry's sexual harassment despite the Company's long history of sexual discrimination.

SECOND CAUSE OF ACTION
Aiding and Abetting Sexual Harassment in Violation of the California Fair Housing and
Employment Act
Gov. Code § 12940 *et seq.*
(Against Individual Defendant Mr. Ward)

54. Plaintiff incorporates all of the preceding paragraphs of this Complaint as if fully set forth herein.

55. Cal. Gov. Code § 12940(j) provides in pertinent part it is an unlawful employment practice for an employer to harass an employee on the basis of sex and/or gender. This section further provides that "loss of tangible job benefits shall not be necessary in order to establish harassment."

56. California courts have held that supervisors are also individually liable for aiding and abetting sexual harassment of an employee. A supervisor may aid and abet sexual harassment by becoming aware of the harassment and failing to take action to stop the harassment. *Matthews v. Superior Court*, 34 Cal. App. 4th 598, 599.

57. Under Cal. Gov. Code § 12926(t), a "supervisor" means: "any individual having the

1 authority, in the interest of the employer, to hire, transfer, suspend, lay off, recall, promote, discharge,
2 assign, reward, or discipline other employees, or the responsibility to direct them, or to adjust their
3 grievances, or effectively to recommend that action, if, in connection with the foregoing, the exercise of
4 that authority is not of a merely routine or clerical nature, but requires the use of independent judgment.”

5 58. As CEO, Mr. Ward acted as Ms. Rogers’ supervisor for purposes of the FEHA. He had
6 authority over and used independent judgment to hire, transfer, discharge, et cetera. He also had
7 responsibility over the direction of Ms. Rogers’ work.

8 59. Mr. Perry unlawfully groped and touched Ms. Rogers’ thigh on numerous occasions
9 without her permission and in a sexual manner, including on June 7, 2022, and August 31, 2022.

10 60. Immediately following the first incident of harassment, Ms. Rogers was promoted, with
11 Mr. Perry becoming her immediate supervisor. Less than one month later Mr. Perry again groped Ms.
12 Rogers. As a result, Ms. Rogers reasonably believed that her employment was impliedly conditioned on
13 acceptance of Mr. Perry’s sexual advances. After reporting these incidents of harassment, Ms. Rogers
14 faced hostility from the Company’s management and was ultimately terminated on July 20, 2023.

15 61. When Mr. Perry groped Ms. Rogers on August 31, 2022, he was aware that she had
16 recently accepted a promotion and that he would be her direct supervisor beginning the very next day,
17 September 1, 2022.

18 62. As CEO of Carta, Mr. Ward was aware of Ms. Rogers’ complaints of sexual harassment.
19 Just 10 days following her complaint to Niesha Sweet in the Company’s Human Resources Department,
20 Carta’s CEO, Henry Ward, began treating Ms. Rogers in an aggressive and demeaning manner during
21 several meetings.

22 63. Although Mr. Ward knew about Mr. Perry’s sexual harassment of Ms. Rogers, he failed
23 to take any action to stop it.

24 64. As a direct, foreseeable, and proximate result of Defendant’s actions, Plaintiff has
25 suffered and continues to suffer harm in an amount according to proof. Additionally, Defendant acted
26 with malice and/or oppression by retaliating against Ms. Rogers and terminating her employment when
27 she had the courage to report Mr. Perry’s sexual harassment despite the Company’s long history of sexual
28 discrimination.

THIRD CAUSE OF ACTION
Retaliation in Violation of the California Fair Housing and Employment Act
Gov. Code § 12940 *et seq.*
(Against Entity Defendant)

65. Cal. Gov. Code § 12940(j) provides in pertinent part it is an unlawful employment practice for an employer to harass an employee on the basis of sex and/or gender.

66. Cal. Gov. Code § 12940(h) further provides that it is unlawful “for any employer...to discharge, expel, or otherwise discriminate against any person because the person has opposed any practices forbidden under [FEHA] or because the person has filed a complaint, testified, or assisted in any proceeding under [FEHA].”

67. Plaintiff participated in a “protected activity” by filing a complaint for sexual harassment with the Company against Mr. Perry. Just 10 days following her complaint to Niesha Sweet in the Company’s Human Resources Department, Carta’s CEO, Henry Ward, began treating Ms. Rogers in an aggressive and demeaning manner during several meetings. The Company’s retaliatory conduct become so prevalent that Ms. Rogers’ manager, Ms. Rachel Mayes, advised Ms. Rogers to stop speaking entirely during a presentation on June 30, 2023.

68. On June 1, 2023, Ms. Rogers, through counsel, sent a letter to Carta’s HR department documenting in detail Mr. Perry’s sexually inappropriate behavior with Ms. Rogers and Defendants’ subsequent illegal behavior. Unsurprisingly, the Company responded by deflecting blame and insinuating that Ms. Rogers fabricated her claims against the Company to escape unfavorable performance reviews. Finally, on July 20, 2023, the Company terminated Ms. Rogers under the pretext of a reduction in force.

69. As a result of the Company’s retaliatory termination of her employment, Ms. Rogers has and will continue to incur economic damages in the form of lost wages. She has also experienced significant emotional distress, including stress, anxiety, and humiliation amongst her peers.

70. As a direct, foreseeable, and proximate result of Defendant’s actions, Plaintiff has suffered and continues to suffer harm in an amount according to proof. Additionally, Defendant acted with malice and/or oppression by retaliating against Ms. Rogers and terminating her employment when she had the courage to report Mr. Perry’s sexual harassment despite the Company’s long history of sexual

1 discrimination.

2 **PRAYER FOR RELIEF**

3 WHEREFORE, Plaintiff prays for relief as follows:

4 A. An award for actual and compensatory damages including lost wages, earnings,
5 employee benefits, and all other sums of money together with interest on these amounts and according
6 to proof;

7 B. For general, special, and incidental damages according to proof;

8 C. For punitive damages in an amount to be determined at trial sufficient to punish, penalize,
9 and/or deter Defendant;

10 D. Equitable and injunctive relief to remedy Defendant's violations of state law, including
11 but not necessarily limited to an order enjoining Defendant from continuing its unlawful practices;

12 E. Statutory penalties under state law;

13 F. Civil penalties;

14 G. Pre-judgment and post-judgment interest, as provided by law;

15 H. Attorneys' fees and costs under applicable law, including expert fees and costs; and

16 I. Such additional and further relief as this Court may deem just and proper.

17
18 Dated: 8/8/2023
19 San Francisco, CA

THE OTTINGER FIRM, P.C.



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